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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

**APPLICATION FOR THE *PRO HAC VICE*
ADMISSION OF JAMIE J. FELL, ESQ.**

Bausch Health US, LLC f/k/a Valeant Pharmaceuticals North America LLC, Bausch Health Americas, Inc. f/k/a Valeant Pharmaceuticals International, and Bausch Health Companies Inc. f/k/a Valeant Pharmaceuticals International, Inc. and all of their affiliates (collectively, “Bausch Health”), by their undersigned co-counsel, Greenberg Traurig, LLP, respectfully make this application (the “Application”), for *pro hac vice* admission of Jamie J. Fell, Esq., and represents as follows:

1. On October 14, 2021, the above-captioned debtor and debtor-in-possession (the “Debtor”), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, as amended the (“Chapter 11 Case”) in the United States Bankruptcy Court for the Western District of North Carolina. On November 16, 2021, the Chapter 11 Case was transferred to the United States Bankruptcy Court for the District of New Jersey [Doc. No. 416].

2. Ms. Fell is an associate of the firm of Simpson Thacher & Bartlett LLP, which

maintains offices at, among other places, 425 Lexington Avenue, New York, New York 10017. Because of her familiarity with the facts and circumstances relevant to the Debtors in the within matter, Bausch Health requests that Ms. Fell be allowed to appear *pro hac vice* for the purposes of representing Bausch Health in connection with the Chapter 11 Case.

3. As set forth in the accompanying Certification of Jamie J. Fell, Esq., Ms. Fell is a member in good standing of the bar of the State of New York and the United States District Court for the Southern District of New York. Ms. Fell is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Ms. Fell has represented that she will adhere to the disciplinary jurisdiction of this Court. Ms. Fell also has represented that she will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 2090-1 and L. Civ. R. 101.1(c), to admit Jamie Fell, Esq. *pro hac vice* in the above-captioned matter.

Dated: April 5, 2023

Respectfully submitted,

/s/ Alan J. Brody
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